

## SECTION 5 - 510(k) Summary

### **ELITech Clinical Systems CREATININE PAP SL**

According to the requirements of 21 CFR 807.92, the following information Introduction

provides sufficient detail to understand the basis for a determination of sub-

stantial equivalence.

The assigned 510(k) number is: K103376

Submitter

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**Date of Preparation** 

November 8<sup>th</sup>, 2010

#### **Device names**

REAGENT

Trade/proprietary Name: ELITech Clinical Systems CREATININE PAP SL

Common or Usual Name: Creatinine, "CREATININE PAP SL"

Class II

Device Class

Classification name Product code

Creatinine test system (Sec.862.1225) JFY- Enzymatic method, Creatinine

Predicate device

Roche Diagnostics Creatinine plus ver.2 (K024098)

Device description

The device for this submission is available as kit only. It consists of 2

reagents, "R1" and "R2".

Reagent R1 contains: MOPS buffer (pH 7.50), EHSPT (N-Ethyl-N-2(-Hydroxy-3-Sulfopropyl)-m-Toluidine), Creatinase (microoganism), Sarcosine

oxidase (microoganism), Ascorbate oxidase (vegetal).

Reagent R2 contains: MOPS buffer (pH 7.50), Amino-4-antipyrine (4-AAP), Creatininase (bacterial), Peroxidase (horseradish), and Sodium azide.

Intended Use

ELITech Clinical Systems CREATININE PAP SL is intended for the quantitative in vitro diagnostic determination of CREATININE in human serum and plasma on Vital Scientific Selectra/Flexor analyzers. It is not intended for

use in Point of Care settings.

Indication for use

ELITech Clinical Systems CREATININE PAP SL is intended to measure creatinine in human serum and plasma. Creatinine measurements are used in the diagnosis and treatment of renal diseases and in monitoring renal di-

alysis.

## Comparison to Predicate device

	ELITech Clinical Systems Device CREATININE PAP SL	Predicate device (Roche Diagnostics Creatinine plus ver.2)
Intended use	Intended for the quantitative in vitro diagnostic determination of creatinine in human serum or plasma on Vital Scientific Selectra/Fiexor analyzers. It is not intended for use in Point of Care settings.	For in vitro diagnostic use in the quantitative determination of creatinine in serum, plasma and urine on the cobas c111 system.
Indication for Use	Creatinine measurements are used in the diagnosis and treatment of renal diseases, and in monitoring renal dialysis.	Creatinine measurements are used in the diagnosis and treatment renal diseases, in monitoring renal dialysis and as a calculation basis for measur- ing other urine analytes.
Assay protocol	Enzymatic colorimetric test	Enzymatic colorimetric test
Composition .	Reagent R1:         MOPS buffer (pH 7.50)         EHSPT       0.4 mmol/L;         Creatinase       ≥ 10 000 U/L;         Sarcosine oxidase       ≥ 3 250 U/L;         Ascorbate oxidase       ≥ 1 000 U/L;         Reagent R2:         MOPS buffer (pH 7.50)	
	4-Aminoantipyrine 2.95 mmol/L; Creatininase ≥ 150 000 U/L; Peroxidase ≥ 4 000 U/L; Sodium azide < 0.1 %;	Reagent R2:         TAPS buffer       50 mmol/L;         Creatininase       ≥ 498 µkat/L;         4-Aminophenazone       0.5 g/L;         Peroxidase       ≥ 16.6 µkat/L;         Potassium hexacyanoferrate(II)       60mg/L;         Detergents       Preservative
Appearance of reagents	Liquid form, ready to use	Same
Sample type	Serum . Plasma	Serum Plasma Urine
Reagent storage	Store at 2-8 °C and protect from light. The reagent is stable until the expiry date stated on the label.	Stored at 2-8 °C. Reagents are stable until the expiry date stated on the label.
Expected values	Serum/plasma: Adults: Females 0.55 1.02 mg/dL Males 0.72 1.18 mg/dL	Serum/plasma: Adults: Females 0.51 – 0.95 mg/dL Males 0.67 – 1.17 mg/dL Children: Neonates(premat.) 0.33-0.98 mg/dL Neonates(full term) 0.31-0.88 mg/dL 2-12 m 0.16-0.39 mg/dL 1-< 3 y 0.18-0.35 mg/dL 3-< 5 y 0.26-0.42 mg/dL 5-< 7 y 0.29-0.47 mg/dL 7-< 9 y 0.34-0.53 mg/dL 9-< 11 y 0.33-0.64 mg/dL 11-< 13 y 0.44-0.68 mg/dL

	ELITech Clinical Systems Device CREATININE PAP SL	Predicate device (Roche Diagnostics Creatinine plus ver.2)
		13-< 15 y 0.46-0.77 mg/dL
Instrument	Vital Scientific SELECTRA JUNIOR	Cobas c111
Measuring range	0.28 – 22.30 mg/dL	0.06 – 30.5 mg/dL
Limit of detection (LoD)	0.006 mg/dL	Serum/plasma: 0.06 mg/dL
Limit of quantification (LoQ)	0.28 mg/dL	ostanii piaoma. otoo mgaa
Precision	Within run	Serum/plasma:
	Level 0.59 mg/dL CV=1.3%	Within run
	Level 1.62 mg/dL CV=0.8%	Level 0.97 mg/dL CV=2.29%
	Level 6.93 mg/dL CV=1.4%	Level 3.95 mg/dL CV=1.16%
		Level 0.77 mg/dL CV=2.86%
		Level 12.7 mg/dL CV=1.26%
	Total	Total
	Level 0.59 mg/dL CV=3.2%	Level 0.97 mg/dL CV=2.35%
	Level 1.62 mg/dL CV=1.6%	Level 3.95 mg/dL CV=0.91%
	Level 6.93 mg/dL CV=2.8%	Level 0.75 mg/dL CV=1.87%
		Level 13.2 mg/dL CV=0.60%
Method comparison	y=1.045x - 0.01 mg/dL	Serum/plasma:
,	r= 0.999	y=1.006x - 1.11899 µmol/L (0.013
	range: 0.30 to 20.30 mg/dL	mg/dL)
		r= 0.9998
		range: 45.9 to 1674 µmol/L (0.52 to 18.9 mg/dL)
Limitations	Hemoglobin: No significant interference up to 500 mg/dL.	Hemoglobin: No significant interference up to an H Index of 800 (ap-
	Triglycerides: No significant interfer-	proximate 800 mg/dL).
	ence up to 3198 mg/dL .	Lipemia (Intralipid): No significant
	Unconjugated bilirubin: No significant interference up to 30.0 mg/dL,	influence up to an L index of 1000.
	Conjugated bilirubin: No significant interference up 14.8 mg/dL.	There is poor correlation between the L index (corresponds to turbidity) and triglycerides concentration.
	Uric acid: No significant interference	Icterus: No significant influence up to
	up to 24 mg/dL.  Glucose: No significant interference	I Index of 20 (approximate conju-
	up to 550 mg/dL.	gated and unconjugated bilirubin con-
	Ascorbic acid: No significant interfer-	centration of 20 mg/dL (342 µmol/L)).
	ence up to 20 mg/dL.	Ascorbic acid: < 300 mg/L does not interfere.
	Methyl-dopa: Induce falsely low results at therapeutic concentrations.	<u>Drugs:</u> No interference was found at
	L-dopa: Induce falsely low results at	therapeutic concentrations using
	therapeutic concentrations.	common drug panels.
	<u>Calcium dobesilate</u> : Induce falsely	Exceptions: Levodopa and calcium
	low results at therapeutic concentra-	dobesilate cause artificially low creatinine levels at the tested drug level
	tions. <u>Creatine</u> : Positive bias from 5 mg/dL.	Other: In very rare cases monoclonal
		gammopathy can lead to incorrect results.
		No significant interference up to a creatine level of 20 mg/dL.
Calibration Frequency	14 days	Each lot and as required following quality control procedures.

	ELITech Clinical Systems Device CREATININE PAP SL	Predicate device (Roche Diagnostics Creatinine plus ver.2)
On board stability	refrigerated area : 28 days	refrigerated area: 4 weeks
Calibrator	Recommended calibration material (not included): ELITech Clinical Systems ELICAL 2	Recommended calibration material (not included): Roche Calibrator f.a.s.
Controls	Recommended quality control material (not included): ELITech Clinical Systems ELITROL I (Normal control) ELITech Clinical Systems ELITROL II (Pathologic control)	Recommended quality control material (not included): Roche Precinorm U Roche Precipath U

#### **Device names**

**CALIBRATOR:** 

**Device Class** 

Classification name Product code

Trade/proprietary Name: ELITech Clinical Systems ELICAL 2 Common or Usual Name: Calibrator, multi-analyte mixture, "ELICAL 2"

Class II

Calibrator (21 CFR 862.1150) JIX- Calibrator, multi-analyte mixture

Predicate device

Roche Diagnostics Calibrator for Automated Systems (C.f.a.s)

(K033501)

**Device description** 

ELITech Clinical Systems ELICAL 2 is a lyophilized calibrator based on human serum containing constituents to ensure optimal calibration. ELICAL 2 is prepared exclusively from the blood of donors tested individually and found to be negative for HbsAg and to antibodies to HCV and HIV according to FDA-approved methods or methods in compliance with the European Directive 98/79/EC, Annex II, List A.

Intended Use

ELITech Clinical Systems ELICAL 2 is a multi-parametric calibrator for in vitro diagnostic use in the calibration of quantitative ELITech Clinical Systems methods on Vital Scientific Selectra Junior Analyzer and Vital Scientific Flexor Junior Analyzer.

## **Comparison to Predicate device**

	ELITech Clinical Systems Device (ELICAL 2)	<u>Predicate device</u> (Roche Calibrator f.a.s.)
Intended use	ELITech Clinical Systems ELICAL 2 is a multi-parametric calibrator for in vitro diagnostic use in the calibration of quantitative ELITech Clinical Systems methods on Vital Scientific Selectra Junior Analyzer and Vital Scientific Flexor Junior Analyzer.	For in vitro diagnostic use in the calibration of quantitative Roche methods on Roche clinical chemistry analysers as specified in the value sheets.
Format	Lyophilized calibrator based on human serum with constituents added as required to obtain desired components levels	Lyophilized calibrator based on human serum with constituents added as required to obtain desired components levels
Level	Single level	Single level
Handling	Carefully open the vial, avoiding the loss of lyophilate, and pipette in exactly 3 mL of distilled/deionized water. Carefully close the vial and dissolve the contents completely by occasional gentle swirling within 30 minutes avoiding the formation of foam.	Carefully open one bottle, avoiding the loss of lyophilate, and pipette in exactly 3 mL of distilled/deionized water. Carefully close the bottle and dissolve the contents completely by occasional gentle swirling within 30 minutes. Avoid the formation of foam.
Traceability	Traceability information is given in the value sheet included in the box.	Traceability of the target value is given in the respective instruction for use of the system reagents.
Stability	Lyophilized: To store at 2-8°C and protected from light until the expiry date	Lyophilized: Stable at 2-8°C up to expiration date.
	After reconstitution, the stabilities are: - 8 hours between 15-25 °C 2 days between 2-8 °C 4 weeks between -25 and -15 °C (when frozen once)	After reconstitution, the stabilities* are: - 8 hours at 15-25 °C 2 days at 2-8 °C 4 weeks at (-25)-(-15) °C (when frozen once)
		*Exception for bilirubin total & direct as noted in package insert

#### **Device names**

CONTROLS:

Trade/proprietary Name: Common or Usual Name:

Device Class

Classification name

ELITech Clinical Systems ELITROL I and ELITROL II Multi-analyte controls - all kinds, "ELITROL I"- "ELITROL II"

Class I

Quality control material (assayed and unassayed). (21 CFR

862.1660)

Product code

JJY- Multi-analyte controls - all kinds

Predicate device

Roche Diagnostics Precinorm U (K041227) Roche Diagnostics Precipath U (K041227)

Device description

ELITECH Clinical Systems ELITROL I and ELITROL II are two level quality control products consisting of lyophilized human serum containing constituents at desired levels.

Elitrol I and Elitrol II are prepared exclusively from the blood of donors tested individually and found to be negative for HbsAg and to antibodies to HCV and HIV according to FDA-approved methods or methods in compliance with the European Directive 98/79/EC, Annex II, List A.

Intended Use

ELITech Clinical Systems ELITROL I and ELITROL II are multi-parametric control sera for in vitro diagnostic use in accuracy control of quantitative ELITech Clinical Systems methods on Vital Scientific Selectra Junior Analyzer and Vital Scientific Flexor Junior Analyzer.

### Comparison to Predicate device

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	ELITECH Clinical Systems Device ELITROL I / ELITROL II	<u>Predicate Device</u> Roche Precinorm U / Precipath U
Intended use	ELITech Clinical Systems ELITROL I and ELITROL II are multiparametric control sera for in vitro diagnostic use in accuracy control of quantitative ELITech Clinical Systems methods on Vital Scientific Selectra Junior Analyzer and Vital Scientific Flexor Junior Analyzer.	For in vitro diagnostic use in quality control by monitoring accuracy and precision for the quantitative methods as specified in the value sheet
Format	Lyophilized human sera with con- stituents added as required to ob- tain desired components levels	Lyophilized human sera with con- stituents added as required to ob- tain desired components levels
Levels	Two levels	Two levels
Handling	Carefully open the vial, avoiding the loss of lyophilate, and pipette in exactly 5 mL of distilled/deionized water. Carefully close the vial and dissolve the contents completely by occasional gentle swirling within 30 minutes avoiding the formation of foam.	Carefully open the bottle, avoiding the loss of lyophilate, and pipette in exactly 5 mL of distilled/deionized water. Carefully close the bottle and dissolve the contents completely by occasional gentle swirling within 30 minutes. Avoid the formation of foam.
Stability	Lyophilized: To store at 2-8°C and protected from light until the expiry date  After reconstitution, the stabilities are: - 12 hours between 15-25 °C 5 days between 2-8 °C 4 weeks between -25 and -15 °C (when frozen once)	Lyophilized: Stable at 2-8°C up to expiration date.  After reconstitution, the stabilities* are: - 12 hours at 15-25 °C 5 days at 2-8 °C 4 weeks at (-25)-(-15) °C (when frozen once)  *Exception for bilirubin total & direct as noted in package insert

### Conclusion

The performance data and other information demonstrate that the safety and effectiveness of these devices versus the predicate devices are not compromised, and that it met all acceptance criteria, demonstrating that the device is substantially equivalent to its respective predicate device.





Food and Drug Administration 10903 New Hampshire Avenue Silver Spring, MD 20993

Seppim S.A.S. C/O Debra Hutson Elitechgroup Epoch Biosciences 21720 23<sup>rd</sup> Dr, SE Suite 150 Bothell, Washington 98021

NOV 1 8 2011

Re: k103376

Trade Name: Elitech Clinical Systems Creatinne PAP SL

Regulation Number: 21 CFR §862.1225 Regulation Name: Creatinine Test System

Regulatory Class: Class II Product Codes: JFY, JJY, JIX Dated: October 26, 2011 Received: October 27, 2011

Dear Ms. Hutson

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820).

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of In Vitro Diagnostic Device Evaluation and Safety at (301) 796-5450. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (301) 796-5760. For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <a href="http://www.fda.gov/Medical">http://www.fda.gov/Medical</a> Devices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance...

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-5680 or at its Internet address

http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm

Sincerely yours,

Countney H. Lias, Ph.D.

Director

Division of Chemistry and Toxicology Devices

Office of In Vitro Diagnostic Device

**Evaluation and Safety** 

Center for Devices and Radiological Health

Enclosure

# **Indications for Use Form**

Device Name:ELITech Clinical Systems CREATININE PAP SL
Indications for Use:
ELITech Clinical Systems CREATININE PAP SL is intended for the quantitative in vitro diagnostic determination of creatinine in human serum and plasma on Vital Scientific Selectra/Flexor analyzers. It is not intended for use in Point of Care settings.
Creatinine measurements are used in the diagnosis and treatment of renal diseases, and in monitoring renal dialysis.
Prescription Use X Over-The-Counter Use (Part 21 CFR 801 Subpart D) AND/OR (21 CFR 801 Subpart C)
(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF NEEDED)
Concurrence of CDRH, Office of In Vitro Diagnostic Devices (OIVD)
Division Sign-Off Office of In Vitro Diagnostic Device Evaluation and Safety
510(k)k103376

# **Indications for Use Form**

510(k) Number (if known): _k103376
Device Name: ELITech Clinical Systems ELICAL 2
Indications for Use:
ELITech Clinical Systems ELICAL 2 is a multi-parametric calibrator for in vitro diagnostic use in the calibration of quantitative ELITech Clinical Systems methods on Vital Scientific Selectra Junior Analyzer and the Vital Scientific Flexor Junior Analyzers.
Prescription Use X AND/OR Over-The-Counter Use
(Part 21 CFR 801 Subpart D) (21 CFR 801 Subpart C)  (PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF NEEDED)
Concurrence of CDRH, Office of In Vitro Diagnostic Devices (OIVD)
Division Sign-Off Office of In Vitro Diagnostic Device Evaluation and Safety
510(k)k103376

# **Indications for Use Form**

510(k) Number (if known): \_k103376\_\_\_\_\_

Device Name: ELITech Clinical Systems ELITROL I ELITech Clinical Systems ELITROL II
Indications for Use:
ELITech Clinical Systems ELITROL I is a multi-parametric control serum for in vitro diagnostic use in accuracy control of quantitative ELITech Clinical Systems methods on the Vital Scientific Selectra Junior Analyzer and the Vital Scientific Flexor Junior Analyzer.
ELITech Clinical Systems ELITROL II is a multi-parametric control serum for in vitro diagnostic use in accuracy control of quantitative ELITech Clinical Systems methods on the Vital Scientific Selectra Junior analyzer and the Vital Scientific Flexor Junior analyzers.
Prescription Use X Over-The-Counter Use (21 CFR 801 Subpart D)
(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF NEEDED)
Concurrence of CDRH, Office of In Vitro Diagnostic Devices (OIVD)
Division Sign-Off Office of In Vitro Diagnostic Device Evaluation and Safety
510(k)k103376